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April 21, 2002

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Nigel R. Bradley
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GREAT BRITAIN

RE: "Black Diaries" Attributed to Sir Roger Casement
The Audrey Giles Report
My File Ref. 020310-A

Dear Sirs:

I am in receipt of a packet of materials from Mr. Mannerings which included a copy of the report issued by Dr. Audrey Giles [hereinafter: Giles Report], dated 8th February 2002, regarding the results of her examination of the so-called "Black Diaries" attributed to Sir Roger Casement. In this report I shall confine myself to an evaluation of the theory, methods and observations given in Giles Report. In a subsequent report I shall report my own observations and opinions regarding the materials supplied by Mr. Mannerings and whether they permit an opinion as to the authorship of the "Black Diaries."

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 1 of 17 pages.)

Since you both have the same materials I have, no reproduction of Giles Report in part or in whole nor of the writings referenced in it shall be attached hereto. The sole exhibit will be Exhibit A, attached hereto, that is a copy of my current curriculum vitae setting forth my background and experience which qualify me to undertake the examination requested and render the opinions expressed herein.

Please note that the evaluation made herein is solely based on a reading and study of Giles Report and not on any extraneous information. I concern myself only with the opinions expressed in the Giles Report and the reasons and reasoning given in support of these opinions. The report is taken on its own internal merits. The order of consideration will be simply the order of the report itself.

Page 2 gives "INSTRUCTIONS" and clearly indicates the desired conclusion: "The Steering Group have set the initial proposition to be that the documents at Kew known collectively as Roger Casement's Black Diaries are genuinely written in his hand throughout." In a forensic investigation, there ought not be an "initial proposition," but one ought to start with an objective question such as: "Are the Black Diaries in the handwriting of Roger Casement? If not, can the writer be identified? If so, is there evidence of who the author is?" Purchasers of forensic opinions are more likely to obtain their preferred "proof" the more they let it be known what is preferred, which is what "the initial proposition" amounts to.

At page 3, it is said the expert "examined these documents using specialized techniques." Though the techniques mentioned later are specialized respective to what ordinary people do and somewhat as to what other disciplines do and how they do it, they are simply ordinary and customary techniques within questioned documents examination. In light of later mention of "special" techniques, tools and methods, I believe the author of Giles Report might have endeavored to give substantive import through professional braggadocio. When I encounter such reportorial ploys, my critical antennae become fully deployed, since it more often than not accompanies a paucity of substance.

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 2 of 17 pages.)

Conclusion number 1 states “many similarities” and “no significant differences.” Why does the author omit “significant” before “similarities”? No amount of similarities will prove authorship unless they be significant for identification. It is difficult to imagine an absolute absence of significant differences between writings by the same person separated by a notable difference in time, topic, circumstances, or physical health. We shall see that indeed there are significant differences mentioned in Giles Report itself, which will then require a reasonable explanation for the opinion of common authorship to be scientifically or technically tenable.

Conclusion number 2 says “it is clearly the case that....” If “clearly the case,” why the need of an expert in handwriting to tell us what is what? “Conclusive” identification would presumably mean “definite,” equating to the degree of proof which English and American courts require for conviction in a criminal case, “beyond a reasonable doubt.” The item ends with: “There is, therefore, no evidence to support the proposition that these documents [1 - 5] are wholesale simulations.” That little sentence encompasses several conclusions which must be demonstrated individually. Primary among these is each questioned writing being separately proven genuine. The sentence also assumes some things might not have to be considered, such as a common authorship but written with intent to disguise. However, we shall take Giles Report on its own merits in light of its own limited vision.

Conclusion number 3 seems to use “contentious entries” for those which are sexual in nature. Maturity and forthrightness would have one come right out and say what one means so that the reader does not have to speculate; however, I will use the terminology the report uses. Apparently this answers a question as to whether parts of the Black Diaries might be authentic and other parts added by another person. This item points up the advisability of a forensic report beginning with a statement of the problem addressed, such as my report began with. The INSTRUCTIONS of the previous page do not satisfy the need. If the expert refined the “initial proposition,” the reader ought to be told the process of refining and why it was done. We are, as it were, at a disadvantage in approaching Giles Report.

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 3 of 17 pages.)

Conclusion number 4 again has “contentious entries,” rather than direct terminology which alone can ultimately dissipate contentiousness. The “less conclusive” evidence “in other cases” leaves us speculating even more. An expert ought to be precise in all statements of fact and conclusion.

Conclusion number 5 states there are “sufficient similarities” that “amount to conclusive evidence.” All of which tell us nothing unless we are told what makes for sufficiency and whether “conclusive evidence” is to be taken as “definite” and thus equating to “beyond a reasonable doubt.” One assumes such is the case.

Conclusion number 6 says nothing much at all really. The author must provide us with the standards for proving or disproving simulation, while bearing in mind that lack of evidence for simulation is not evidence of genuineness. Indeed, lack of evidence for one of a pair of contradictory propositions is not proof of the other; so that lack of evidence of simulation is not proof there was no simulation, merely that one has no grounds to assert it.

Qualifications and experience provide no evidence for or against an expert’s opinions. Besides, no expert provides other than one’s own most sterling recommendations, because none of us are endowed with any kind of cosmic objectivity about how competent and credible we are. I thus skip page 4.

Page 9 gives the author’s “instructions.” Notably absent is the most critical instruction, namely the precise wording of the problem or question the expert was to address. They should be introduced in some way such as this: “I was asked can it be determined whether Roger Casement wrote Document X and, if not, can the author of it be identified.” Then, after enumerating each question posed, the list of conclusions can be similarly and correspondingly enumerated immediately following. The style of Giles Report leaves much to be desired as a professional product. Further observation of this general failure will not be made unless unavoidable, though it could be made often and extensively.

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 4 of 17 pages.)

Page 10 describes “THE QUESTIONED DOCUMENTS” and pages 11-14 “EXAMINATION” made. All in all, the report’s arrangement is cumbersome and repetitive, while lacking the most critical data needed to evaluate the reliability of the methodology and the validity of the opinion. Forensic reports in handwriting often have long details of the nuts and bolts of the work with a poverty of substantive reasons and reasoning for the opinion. We will see Giles Report disappointingly follows the trend.

At page 11 it mentions “using a stereomicroscope at magnifications of x7 to x45....” Was every part of every document examined at all those magnifications? If so, at what intervals: x7, x8, etc.; x7, x14, etc.; or other intervals? I point this out only to indicate the preposterous nature of such assertions. All the reader cares about is with what results. All that need be said is that document such-and-such has this minute detail indicating this conclusion. We will see the reported results of all these examinations are minuscule compared to the report of the examinations themselves. The cynic in me suspects that only if one has scant results would one have scant report of results and lengthy report of efforts to obtain results.

The one technique of the Video Spectral Comparator is referred to as “these techniques” which let one see what the unaided eye cannot. So what, unless all that was so seen is shared with the reader? Having begun by saying she used an x7 to x45 stereomicroscope, she now says she also used “low power microscopy.” One brag about any given technique is sufficient, unless one has a nagging feeling of insufficiency.

Page 11 ends with “Examination of impressions.” Why not just say these impressions were found on these documents and they mean thus and so? Reporting results necessarily reports a competent technique in obtaining results. Reporting the technique employed, but without sharing the value attributed to the results vis-a-vis the problem being addressed, is inexcusable.

Page 12 pads the report with quotes from various authors. As with techniques, such quotes should only be given to explain what import is to be

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 5 of 17 pages.)

given to observations which are first reported. So one says this characteristic was found to be true of the ink on a certain document. This characteristic means this because an authority on the topic says thus and so. A list of 9 physical aspects of ink are given, but the report never states how any given ink on any given document measures up on them.

She ends the page by saying she “noted the physical difference, appearance and differences between inks as appropriate....” First, is there a difference between noting “physical differences” and noting just “differences” between inks? Second, where is all this data tabulated in the report? Nowhere. So why are we denied the principal purpose of a scientific report, which is the sharing of data obtained through the examinations? Instead, Giles Report settles for the secondary purpose of a forensic report: asserting what the expert thinks the data proves. Both are essential, IF both are requested, but the first is primary and ought always be provided absent specific instruction to the contrary. Was she asked to withhold her alleged data obtained through all her esoteric examinations and techniques? If so, why are we denied the data?

On page 13 are given the characteristics to be noted about the “work of a particular pen.” Having made “observations and measurements of these features as appropriate,” why are they not tabulated in the report if they were indeed appropriate? Pencil writing is also discussed on page 13, and any resulting data is also denied us. Discussing theory from notable authors is no redemption for a notable lack of data regarding the documents under discussion.

Page 14 begins with: “It is an established fact that handwriting can be recognized.” So, we recognize handwriting as handwriting. But does Giles Report state precisely the identifying traits of Casement’s authentic writings which, number one, characterize each period of his life and which, number two, can be considered stable throughout all periods of his life? In a word, our expert must be expert enough to demonstrate the precise complex of traits, significant for identification, which characterize Casement’s handwriting through all periods of his life and in any given period of his life. Absent that, there is no expert foundation for determining whether any questioned writing is or is not by him.

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 6 of 17 pages.)

Absent such a showing, the discussion on page 14 is fluff at best and the rest of the report is of no technical value to establish the fact at issue.

At least, before leaving page 14, we are once more assured that the stereomicroscope and Video Spectral Comparator were used. Of value for later evaluation of Giles Report is the claim these features were taken into account:

- (a) size;
- (b) shape of characters (presumably form or style of letters);
- (c) internal proportions of characters;
- (d) number and order of strokes in characters;
- (e) line direction; and
- (f) crossings (though not explained as to t-crossings or any crossing of any strokes).

They make for a great paucity of observation and are hardly the most significant traits for identification, but we at least have something to measure whether the later data on handwriting is as complete as Giles Report envisions it here. Failure of the expert to note and report all six features given here would mean performance is even more lean than conception and does not meet its own rather low standards of observation.

On page 15 is given the schedule for "EXPRESSION OF CONCLUSIONS," which is rather late since the conclusions were given on page 3. A properly organized report physically associates things which are ideationally related. The terms parallel those which are standard in America, though not exactly similar. The one weakness in every listing of these terms which I have seen is the failure to state what justifies a higher term of probability over a lower one. Thus Giles Report has informed us the identification of Casement as author of the "Black Diary" to be conclusive, but the expression of conclusions does not tell us what is the standard for stating "conclusive" over a lower term of probability. My position is that any lack in any standard in the process of identifying handwriting, which lack is not fully compensated for in some way, forestalls one from making a "conclusive" finding (or "definite" in American terminology).

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 7 of 17 pages.)

On page 15 begins the segment “UNDISPUTED HANDWRITINGS OF ROGER CASEMENT.” To be intelligently organized, all exemplar writings should be arranged and illustrated chronologically. Then one should set forth what has been described previously in this evaluation, that is, what identifying traits are stable throughout all exemplar writings and what characterizes the various periods into which the exemplars might be grouped. Examples of what can demarcate a particular period would be the onset of a serious illness or the development of a new writing characteristic such as adoption of a new style for a particular capital letter. If these essential things were done, Giles Report does not share them with the reader.

On pages 16 and 17 are given characteristics observed in the exemplars. Let us group them under the types of traits Giles Report gave earlier as the kind of observations made:

(a) SIZE:

- variable in letter to Mrs. Morel 1911
- sometime very large in same letter
- EVALUATION: which two items make for a very meager observation of size, not the least bit specific or detailed enough to be significant for identification

(b) SHAPE OF CHARACTERS:

- forms less detailed in 1911 letter to Morel (without designating less detailed *than what other writing*)
- well-formed (without definition of the term, and thus a formless idea)
- consistent (although, for example “off” in Illustration 3 has inconsistent forms of “f”)
- single stroke cursive “E” (peculiarly qualified as being “where a block capital would normally not be expected;” since cursive “E” is not a block capital the unexpected has not occurred)
- “G” and “g” single looped structure
- “d” ending with upward stroke of loop of left tendency
- EVALUATION: form (also called style or shape of characters) is the least compelling evidence in handwriting identification; the above would not

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 8 of 17 pages.)

specify any individual's style and misses a wealth of potential observations in Casement's exemplars and in the questioned materials

(c) INTERNAL PROPORTIONS OF CHARACTERS:

- consistent (although every illustration of exemplars has size ratio variation throughout)
- "d" with broad upper loop
- "t" with high or low crossbar (however, mostly with right placement, even being detached)
- "s" horizontally elongated
- "bowl" of "y" not fully formed (that is, the "u" portion; many a "y" being otherwise)

• EVALUATION: if one of these observations were not obviously incorrect and two others incomplete, they might have amounted to worthy, though not compelling, evidence

(d) NUMBER AND ORDER OF STROKES IN CHARACTERS:

- EVALUATION: No observation given for this, so Giles Report fails its own promise to us

(e) LINE DIRECTION:

- EVALUATION: No observation given for this, so Giles Report fails its own promise to us

(f) CROSSINGS:

- EVALUATION: No observation given for this, so Giles Report fails its own promise to us

(g) OBSERVATIONS NOT BELONGING TO ABOVE GROUPS:

- "widely spread" handwritings in 1911 note to Morel (could mean liberally spaced on page or width of letters/words greater than most writers use)
- fluently written (without definition, which perplexes the reader since the sample immediately above has some awkward forms, hesitations, etc.)
- "number of distinctive features throughout" (a useless statement to some degree since only 7 generalizations of an undesignated number are given)
- "s" with small pen movement (other letters also, so why single out "s"?)
- word connections (called "long" though not longer than customary spacing between words; called "fluent" though some are anything but)

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 9 of 17 pages.)

- **EVALUATION:** these are things beginners or ill trained observers or dilettantes would feel proud of having observed; they are useless for the task at hand, since some are incorrect, others incomplete, some unclear as to what is meant, and the rest not unique to Casement either singly or in combination

Page 18 ends with a note about variation. Such generalized silliness is typical of the superficial and unscientific “expert.” The examiner must define the specific characteristics of a writer’s variation. Since “everybody’s handwriting” is said to have “natural variation” to the some degree, we need to know *what* characterizes Casement’s variation vis-a-vis anyone else’s. For example, does he vary one letter rather than another? Which variations occur together and which occur individually? In what features does variation most occur, such as slant, base line, size? If, for example, size varies, does it vary randomly, at a particular place within words, within lines, within sentences, within paragraphs? The author of Giles Report seems oblivious to all observations of handwriting which are inconspicuous and which are difficult to make and record. What good was all that esoteric equipment if all one ends up with is such a meager, insignificant and faulty set of observations? Lastly, since more than 90% of the potential observations of handwriting are not even touched on, the statement that no significant differences were found fades into insignificance, because most of the handwriting characteristics seem not to have been noticed.

Pages 19-21 provide much pointless information about “THE ARMY FIELD NOTEBOOK.” The bottom of page 21 states observations on the notebook. Nothing specific is given, and the generalized observations do not tie in with any of the specific types I gathered together above for the exemplars. Only blind, unjustified faith or prior bias would induce one to credit the statement under *Results* on page 21.

Page 22 provides the conclusion of Giles Report for the notebook, which is what the Steering Group stated on page 2 was their thesis. A strange statement is made that consideration was given to whether someone other than Roger Casement wrote all or part of the notebook. The statement is strange

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 10 of 17 pages.)

because how can any other person be considered when no other person's exemplars are stated to have been examined? When a client provides massive amounts of material for one person but nothing for any other person who was ever mentioned or might be considered as a possible author of the questioned material, one can be assured that act underlines what the expected conclusion is. Not so strangely, expectation is hardly ever disappointed in such situations.

Beginning on page 23 is discussion of "THE 1903 LETT'S POCKET DIARY." Here also much pointless data is given. Is it to impress the reader with the massive effort or in hopes that useless investigations will give credence to the useful but wholly inadequate investigation? I suspect both at this point since it is the major feature of Giles Report. When examinations result in data not useful for resolving the fact at issue, one ought merely state such is the case. Bulk only impresses the unperceptive reader. For the perceptive, bulk is bunk.

On page 25 anomalies are noted, such as text squeezed in, notable reduction in size of writing in some areas against greatly expanded writing in others. Every such anomaly must be specifically addressed by the examiner and a reasonable explanation given if supported by evidence and proper theory. These anomalies are not revisited, and thus Giles Report is once more worthless on a critical point and generally not worthy of credence.

At the top of page 26 we are finally informed that "contentious entries" means explicitly sexual material. Why not just say what is meant? Is it clever or inadvertent when "contentious" entries are not illustrated? The reader is denied the opportunity to verify the reported observations, which are not to be credited since those observations which can be verified are often mistaken, while otherwise being scientifically incomplete and mostly superficial. The most critical statements of observation made so far are protected from falsification as well as verification by the reader. Was there a need for such protection?

Under "Comparison of handwritings" the same generalized statement of *Results* is given, as also under "Conclusions" on page 27. The alleged comparative observations between "contentious" and "innocuous" entries are a

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 11 of 17 pages.)

masterpiece of double talk. Having earlier stated how squeezed in and so on “contentious” entries are as compared to others, there is now no significant differences to be found. All anomalies are dismissed as insignificant. However, even while saying there are no differences, it seems to say there are. The discussion on page 27 is either skillful ambiguity or poor proofreading.

On page 28 begins discussion of “THE DOLLARD’S OFFICE DIARY 1910.” The same pattern of pretentious and useless bulk is followed. On page 29 under “Blank pages,” the author ends a report of critically important information by saying: “I am unable to comment on the significance of this variation.” We are thus spared the usual obfuscation of observation and gratuitous opinion but treated to a confession of expert inadequacy. For this diary also, the “contentious” entries are not illustrated, only an innocuous one.

On page 32, having described notable variations between some “contentious” and some “innocuous” entries, results are predictably what the Steering Group defined as the “initial proposition” (read: “result desired and expected”). Once more the marvel of considering other writers without considering their exemplars is reported.

On page 33 begins consideration of “THE LETT’S OFFICE DIARY 1911.” There is the usual giving of data which is never connected to the fact at issue. On page 34 an incorrect understanding of what a UV light examination can prove is used to support a conclusion. I quote a Peter Singleton-Gates whom Gyles Report quotes on page 34: “The [UV light] examination showed that no possible erasures had been made and that there had been no interpolations. The ray revealed a consistency of the handwriting of the same ink used on every page.” Actually we have several misunderstandings:

1. UV light might reveal an erasure, but it cannot prove the impossibility of erasures being present. It is only one of several means of detecting erasures. Further, it will not yield its full potential of evidence unless all three commercially available ranges of UV light are used, each with all customary filters.

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 12 of 17 pages.)

2. Nor can UV light eliminate all possibility of interpolations. Since there are many ways to interpolate new text into a document, use of all methods for detecting such might not discover some interpolations. For example, suppose I were handwriting this paragraph and came to the last line which was but one word. Someone tells me I should modify what was said, so the next day I interpolate a short sentence on the same last line, using the same pen as before. All the UV light in the world with all the most sophisticated equipment for use of UV light and employment of a million filters would not detect the last sentence as an interpolation.

3. UV light does not tell us whether any handwriting is consistent, though it can detect some inconsistencies. Only good old fashioned, intelligent and competent handwriting examination can determine inconsistencies in the most satisfactory manner. For example, if 100 t-bars were in a sample and were all made differently, what value could UV light possibly add to simple observation? If they were all made with the same ink on the same paper at the same sitting, UV light would see them as chromatically consistent.

4. UV light examination can positively prove different inks are used only if they have different formula which react differently under the UV light and if the equipment and filters employed are sensitive enough to distinguish the different reactions. But if different formulas of ink have components which do not react under UV light or react in the same way, the examination will not reveal that they are different inks. That is why properly applied ink chemistry can prove facts no specialized light examination can.

5. Underlying the above four misunderstandings about UV light are two logical fallacies which are often unrecognized by the scientifically unaware. These two logical fallacies are the violations the following principles:

- (a) Absence of evidence for a fact is not positive evidence for its contrary; and, a corollary to this,
- (b) A fact at issue must be proved by positive evidence pertinent to it.

It is satisfactory to see Giles Report impeach the quote discussed above. Wilson R. Harrison is cited to the effect that the inferences quoted are from incorrect procedure. The Harrison cite is introduced with a peculiar sentence: "He cautions the use of this technique...." What was meant is surely something

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 13 of 17 pages.)

like “he cautions us concerning the use of this technique.” In any case, the passage from Harrison says that “many a forged document has been given a cursory examination by ultra-violet light and declared free from erasure. Any suspect document has to be given a thorough examination which extends far beyond a visual inspection by ultra-violet light if erasures are not to go undetected.” Rather than going far beyond inspection by ultra-violet light, Giles Report seems to tell us Peter Singleton-Gates and Dr. Letitia Fairfield performed only an ultra-violet examination. We can suspect erasures might well have gone undetected with employment of a single procedure out of the several which ought to have been employed.

It is then said oblique light and magnification should be used to detect erasures, which is true as they are the major two of the several methods.

On page 35 under “Blotter entries” we are once more given much data without any indication of its relevancy or irrelevancy. If the author has not found use for the data in resolving the fact at issue or in formulating newer questions of importance, it ought to be left out of the report. Since that is not done, as it has not been done in so many similar situations, the extensive description of the unused, if not useless, data is nothing short of padding and a distraction from focusing on the problem.

The author continues to have difficulty, it seems, in saying “sexual” entries and says “contentious.” It is repeatedly asserted that contentious and innocuous entries are consistent in appearance. Recall that “consistent” did not appear among the expressions for conclusions on page 15. That can only mean that “consistent with” or “inconsistent with” has no value in expressing a conclusion as to identification. Indeed, semantically, being consistent with a thing only means that with which it is consistent is at least possible but that there is nothing to eliminate the opposite of that with which it is consistent. Being inconsistent with a thing would at best suggest the two are possibly mutually exclusive, though not necessarily so. Inconsistent things have often coexisted while consistent things have often existed apart. In summary, “consistent with” and “inconsistent with” only give an illusion of some kind of reality.

(From Matley to Mannerings and Bradley, re “Black Diaries” Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 14 of 17 pages.)

At least on page 36 we seem finally to have been given illustration of a contentious entry, minus an innocuous entry for comparison. To make up for this, no anomaly will be provided with a reasonable explanation, which is required wherever the anomaly is a significant difference.

Under *Results* on page 36 we are told many similarities were found, but we are not told precisely what they are or whether any are significant for identification. There were allegedly no significant differences, however, if the anomalies described were not found within the authentic diaries, they become significant differences which, absent a reasonable explanation, at least prevent an identification from being made. If they are of great import, as their numbers and descriptions suggest they are, they are positive evidence of falsity absent a reasonable explanation. The author seems content with a cavalier dismissal of anything disturbing to a comfortable support of the client's "initial proposition."

On page 37 it is said consideration was given to the proposition that another than Casement wrote any or all of the diary, although still no one else's handwriting was considered. There is an endemic tendency among handwriting examiners simply to presume that no one else in the entire world throughout the history of humankind could have possibly had the same list of superficial and limited traits the current suspect is said to have. Indeed, as with Giles Report, most examiners begin by stating or implying that everyone's writing is distinctively and uniquely identifiable, so that no one else's writing need be bothered with. Such an attitude is both presumptuous and empirically unfounded.

The last paragraph on page 37 asserts several opinions which are never demonstrated. These are conclusory and as such would be inadmissible at trial. Certainly, no discriminating reader would be so foolish as to gulp down conclusory opinions by any expert. Gullibility on the part of the reader is as reprehensible as unsupported pronouncements on the part of an "expert."

Page 38 begins consideration of "THE 1911 CASH LEDGER." Once more precise data on handwriting is not shared with us. Generalizations are the

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 15 of 17 pages.)

order of the day. Nor are we told what constitutes the author's concept of "consistent with," "neat handwriting," "well-shaped," and so on. These are wholly subjective terms absent expression of a standard by which we can measure precise letters, words or phrases which exhibit the traits they express. In summary, the author does not deign to share the reasons and reasoning for her conclusions. Where she seems to, she does not satisfy her own theory and does not make precise, demonstrable and verifiable observations.

On page 46 we seem to be given illustration of a contentious entry, but it is cut off on the right edge and thus not entirely decipherable. One wants to know why a financial ledger has doubled as a journal. Who maintains a personal diary of sexual intimacies in a financial journal which by its very nature is meant to provide others with evidence of expenditures and/or income? The two types of entries simply do not rationally belong together both as to purpose and as to the intended reader. Further, why would a keen diplomat keep damaging information in formats which by their very nature would normally come under scrutiny of superiors, authorities, friends and family? We ought to be told some reasonable explanation for such an imprudent course of action for a person known for his prudence. Granted, such a consideration is not properly in the purview of a handwriting examiner, but it is part of the total picture the handwriting opinion must be in harmony with.

The segment ends with the usual generalities and questionable assertion that others were considered as possible authors without considering their exemplar writings. The various segments are near to being a series of boilerplate reports. If these repetitive statements were said once only for all questioned writings, several pages could have been cut from the final work product. That makes one suspect that indeed bulk is an essential part of the evidence offered.

Pages 42 to 44 consider "THE PUTUMAYO JOURNAL." It repeats the same pattern of unused and/or useless data, generalities, obfuscation, and conclusory opinions.

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 16 of 17 pages.)

Pages 45 and 46 are a segment titled "OVERALL CONCLUSIONS." This segment merely summarizes the generalities and conclusory opinions expressed throughout the previous 44 pages. The last paragraph states "there is conclusive evidence" for the opinion as to two of the documents. The segments on those two documents did not share any conclusive evidence nor does this segment do so. The report has not reported what it claims is the factual bases for any of its conclusions, only asserting that there are factual bases.

The references are presumably selective. In quoting from these references in the text, no page numbers are given to facilitate verification of the quote and its context. Omission of page numbers is slovenly scholarship, a trait "consistent with" the professional inadequacy of format and content throughout Giles Report.

Osborn's name is misspelled which is inexcusable if one has the man's book in hand. There is no final "e." There are many papers and books on inks of the late 19th and early 20th century. Did the author look at only one, or know of only one, or gave us only a sample citation? In any case, the standards set forth in Osborn's *Questioned Documents, second edition* and Harrison *Suspect Documents: Their Scientific Examination* are not followed in the main. In a cross-examination at trial, a competent barrister enjoying the advice of a knowledgeable document examiner could impeach every aspect of Giles Report. It is a classic example of forensic junk science. Even if every document examined were the authentic writing of Casement, this report does nothing to establish the fact. Pronouncements from on high, however repeated and solemnly proclaimed, constitute neither proper technical procedure nor credible scientific evidence.

Respectfully yours,

Marcel B. Matley

(From Matley to Mannerings and Bradley, re "Black Diaries" Attributed to Sir Roger Casement, The Audrey Giles Report, April 21, 2002, page 17 of 17 pages.)

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Since this publication was issued, certain changes were made in the means of communicating with and contacting me. The physical street address, 3092 Cesar Chavez St., San Francisco, CA 94110, remains the same as does the Postal Service mail box, PO Box 882401, San Francisco, CA 94188-2401. Please mail to the postal box number since it is a secure service. Local delivery is occasionally misplaced or put into the mail slot of the wrong house.

My web site is www.handwritingexpertconsultant.com.

My e-mail address is matleyhwexpt@aol.com. Please note AOL did not permit me to have the second "e" in "expert." I have no idea why.

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If I cannot assist you for any reason, I will endeavor to assist you in finding a reliable expert.